

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|------------------------------------|---|----------------------|
| TRUSTEES OF THE SUBURBAN TEAMSTERS |) | |
| OF NORTHERN ILLINOIS WELFARE AND |) | |
| PENSION FUNDS, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | No. 2014 C 7484 |
| v. |) | |
| |) | Judge St. Eve |
| |) | |
| T & W EDMIER CORP., |) | |
| a dissolved Illinois corporation |) | Magistrate Judge Kim |
| |) | |
| Defendant. |) | |

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on September 26, 2014 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Pursuant to the Court's Minute Order of January 20, 2015, Plaintiffs filed their Amended Complaint on January 23, 2015. Defendant's responsive pleading was due February 3, 2015. No responsive pleadings has been filed. Time to do so has now run.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

| | |
|-----------------|----------------|
| \$15,811.07 | Pension |
| \$17,080.60 | Welfare |
| \$925.00 | Attorneys fees |
| <u>\$432.00</u> | Court costs |
| \$34,248.67 | |

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, T & W EDMIER, a dissolved Illinois corporation, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION AND WELFARE FUNDS in the amount of \$34,248.67

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION AND
WELFARE FUNDS

s/John J. Toomey
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Dated: February 4, 2015